

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

JUL 24 2025

Nathan Ochsner, Clerk of Court

RYNEASHA REED
JOHNATHAN ARTHURTON
Plaintiffs

v.

KIA FINANCE AMERICA, et al

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§
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§

CIVIL ACTION NO. 4:25-mc-00993

**PLAINTIFF'S MOTION FOR HEARING ON DEFAULT JUDGMENT TO THE HONORABLE
JUDGE OF THE COURT**

Plaintiff Ryneasha Reed (main defendant who was in controversy of the defendant of True Accord), respectfully requests that the Court set a hearing on Plaintiff's forthcoming Motion for Default Judgment against TrueAccord Corp., and in support thereof states:

1. Defendant TrueAccord Corp. was served on June 25, 2025, and has failed to answer, plead, or otherwise appear. The 21-day deadline expired on July 16, 2025.
2. Plaintiff intends to seek damages in the amount of **\$1,250,000.00** based on a special endorsement and a recorded fee schedule under commercial contract principles.
3. Due to the complexity and nature of the damages, Plaintiff believes that a hearing is warranted under

Fed. R. Civ. P. 55(b)(2), and is prepared to provide documentation and sworn testimony in person or in
PLAINTIFF'S MOTION FOR HEARING ON DEFAULT JUDGMENT TO THE HONORABLE JUDGE OF THE COURT

video if the Court deems it necessary.

WHEREFORE, Plaintiff respectfully requests the Court to set a hearing on the issue of default judgment at the Court's earliest convenience.

Respectfully submitted,

/s/ Rynecasha Reed

Plaintiff, Pro Se

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of July, 2025, a true and correct copy of the foregoing *PLAINTIFF'S MOTION FOR HEARING ON DEFAULT JUDGMENT TO THE HONORABLE JUDGE OF THE COURT*, along with the Proposed Order, was sent via U.S. Mail (**9589 0710 5270 1018 5174 19**) to the following party:

TrueAccord Corp.

16011 College Blvd, Ste 130

Lenexa, KS 66219

Registered Agent: Corporation Service Company

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ORDER SETTING HEARING ON DEFAULT JUDGMENT

Before the Court is Plaintiff Ryneasha Reeds *Motion for Hearing on Default Judgment against Defendant TrueAccord Corp.* Upon consideration, the Court finds that the motion should be GRANTED.

IT IS THEREFORE ORDERED that a hearing on Plaintiff's Motion for Default Judgment is set for:

Date: _____ Time: _____ Courtroom: _____

Before: Hon. _____, United States District Judge

Plaintiff shall appear prepared to present supporting documentation and testimony regarding the requested damages.

SO ORDERED.

Signed this _____ day of _____, 2025.

UNITED STATES DISTRICT JUDGE

PLAINTIFF'S MOTION FOR HEARING ON DEFAULT JUDGMENT TO THE HONORABLE JUDGE OF THE COURT

Hyneasha Marie Ansham Reed
3708 E 29th Street #1020
Houston TX, 77802

United States Courts
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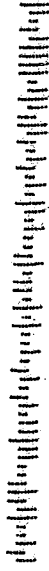
Nathan Oehsner, Clerk of Court

United States District Clerk's Office

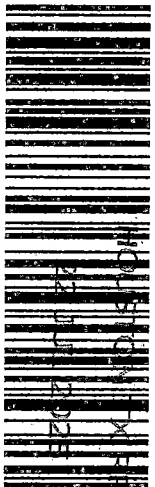
P.O. Box 61010

Houston, TX 77208-1010

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